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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:	:	CHAPTER 13
MICHAEL P. SULLIVAN and	:	CASE NO. 12-25363/GMB
KRISTEN A. SULLIVAN	:	
Debtor	:	CERTIFICATION IN SUPPORT OF
	:	MOTION TO REOPEN CHAPTER 7
	:	CASE
	:	

I, Joni L. Gray, being of full age, hereby certifies as follows:

1. I am one of the attorneys for the debtor in the above-referenced matter and make this certification in support of my application for reopening and reinstatement of this case.
2. The debtors' case was filed on June 15, 2012. Among the property listed on the debtors' schedules was a worker's compensation claim. At the time of the filing of the case and as listed on the debtors' schedules, no third party claim was pending. The debtors' schedules revealed that Richard Asselta, Esq., was the attorney assisting them in this matter.
3. Debtors' case was successfully administered and a Discharge Order was entered on September 14, 2012.
4. On April 24, 2014, Andrew Finberg, Esq., received notification from the debtors' aforementioned counsel that a third party action was subsequently filed roughly one (1) year after the bankruptcy petition.
5. It is our belief that this represents an asset of the Chapter 7 estate. Accordingly, we are

seeking the reopening of this case so that the third party action may be properly administered for the benefit of the creditors.

6. For the foregoing reasons, it is respectfully requested that an Order be entered reopening the debtors' case.

I hereby certify that the forgoing statements are true and correct to the best of my knowledge and that if any of the forgoing statements are false, I am subject to punishment.

/s/ Joni L. Gray

JONI L. GRAY

Dated: April 28, 2014